	JUNJI SUZUKI (SBN 184738)
1	junji@marshallsuzuki.com
2	TOKIKO YASUDA (SBN 257128) tokiko@marshallsuzuki.com
3	MARSHALL SUZUKI LAW GROUP, LLP
4	230 California Street, Suite 415 San Francisco, CA 94111
5	Telephone: (415) 618-0090
6	Facsimile: (415) 618-0190 Attorneys for Shogakukan Inc., Shueisha Inc.,
7	KADOKAWA CORPORATION, and Kodansha Ltd.
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9	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
11	) Case No: 3:21-mc-80275
12	In re DMCA Subpoena to
13	Cloudflare, Inc.  DECLARATION OF HIROYUKI NAKAJIMA
14	)
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17	I, Hiroyuki Nakajima, declare and testify as follows:
	1. I am an attorney duly licensed to practice law in Japan. I represent Shogakukan
18	Inc., Shueisha, Inc., KADOKAWA CORPORATION, and Kodansha Ltd., each a Japanese
19	corporation, in the above-entitled proceeding and as such, I am authorized and qualified to
20	make this declaration for and on their behalf, and I make this declaration for that reason.
21	2. Shogakukan Inc., Shueisha, Inc., KADOKAWA CORPORATION, and
22	Kodansha Ltd. are seeking a subpoena pursuant to 17 U.S.C. § 512(h) to obtain information
23	sufficient to identify the persons infringing its copyrighted works.
24	3. The purpose for which this subpoena is sought is to obtain the identity of the
25	alleged infringers. Such information will only be used for the purpose of protecting rights
26	under the Copyright Act (17 U.S.C. § 101, et seq.).
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1	I declare under penalty of perjury under the laws of the United States of America that the
2	foregoing is true and correct.
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4	Executed on November 15, 2021.
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6	Hiroyuki Nakajina Hiroyuki Nakajima
7 8	Attorney for Shogakukan Inc., Shueisha, Inc., KADOKAWA Corporation, and
9	Kodansha Ltd.
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